

Rory T. Kay, Esq. (NSBN 12416)  
Karyna Armstrong, Esq. (NSBN 16044)  
Kiley A. Harrison, Esq. (NSBN 16092)  
McDONALD CARANO LLP  
2300 West Sahara Avenue, Suite 1200  
Las Vegas, Nevada 89102  
Telephone: (702) 873-4100  
[rkay@mcdonaldcarano.com](mailto:rkay@mcdonaldcarano.com)  
[karmstrong@mcdonaldcarano.com](mailto:karmstrong@mcdonaldcarano.com)  
[kharrison@mcdonaldcarano.com](mailto:kharrison@mcdonaldcarano.com)

Hwan Kim, Esq. (D.C. Bar No. 463623)  
(Admitted Pro Hac Vice)  
SHEPPARD MULLIN RICHTER & HAMPTON LLP  
2099 Pennsylvania Avenue, N.W., Suite 100  
Washington, DC 20006-6801  
Telephone: 202-747-1949  
[hkim@sheppardmullin.com](mailto:hkim@sheppardmullin.com)

Neil A.F. Popović, Esq. (California Bar No. 132403)  
(Admitted Pro Hac Vice)  
Joy O. Siu, Esq. (NSBN 15095)  
SHEPPARD MULLIN RICHTER & HAMPTON LLP  
Four Embarcadero Center, 17th Floor  
San Francisco, CA 94111  
Telephone: 415-774-3156  
[npopovic@sheppardmullin.com](mailto:npopovic@sheppardmullin.com)

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

FREMICHAEL GHEBREYESUS,  
individually and as Trustee of the Estate of  
Ghebreyesus Ghebrelul Fremichael; and  
SIMRET ZERAI YOHANNES (A/K/A  
SEMRET ZEREYOHANS KELEB),

Plaintiffs,

vs.

THE FEDERAL DEMOCRATIC REPUBLIC  
OF ETHIOPIA, THE MINISTRY OF  
FOREIGN AFFAIRS OF ETHIOPIA, THE  
CITY OF ADDIS ABABA, THE SUB-CITY  
OF BOLE, ADDIS ABABA, FEDERAL  
FIRST INSTANCE COURT OF ETHIOPIA,  
BROOK BEKELE BESHAH (A/K/A BIRUK  
BEKELE BESHAH; A/K/A BIRUK  
BEKELE; A/K/A BROOK BEKELE),

Defendants.

Case No.: 2:22-cv-01717-RFB-EJY

**STIPULATION AND ORDER TO  
EXTEND PLAINTIFFS' DEADLINE TO  
FILE OPPOSITION TO DEFENDANT  
BROOK BEKELE BESHAH'S MOTION  
FOR SUMMARY JUDGMENT**

**FIRST REQUEST**

Under Local Rules IA 6-1, 7-1, and 26-3, Plaintiffs Fremichael Ghebreyesus, individually and as Trustee of the Estate of Ghebreyesus Ghebrelul Fremichael, and Simret Zerai Yohannes (“Plaintiffs”) and Defendant Brook Bekele Beshah (“Bekele”) hereby agree and stipulate to the following:

1. On March 12, 2025, Defendant Bekele filed his Motion for Summary Judgment (ECF No. 132).

2. Bekele’s previous deadline to file his dispositive Motion for Summary Judgment was February 24, 2025. However, the parties stipulated, per Bekele’s request, that the deadline be extended to March 14, 2025.

3. Plaintiffs’ deadline to file their Opposition to Bekele’s Motion for Summary Judgment is April 2, 2024.

4. Due to some internal staffing changes that have arisen as a result of conflicting obligations for the undersigned in unrelated cases, the parties stipulate and agree to extend Plaintiffs’ opposition deadline to April 21, 2025.

5. Plaintiffs’ counsel is in the process of integrating two new team members, which has necessitated additional time to ensure that they are thoroughly briefed on case developments and background information.

///

///

///

///

This request for extension of time is not intended to cause any delay or prejudice to any party.

**IT IS SO STIPULATED.**

Dated this 21st day of March 2025.

Dated this 21st day of March 2025.

**BECKSTROM & BECKSTROM, LLP**

**MCDONALD CARANO LLP**

By: /s/ James A. Beckstrom

James A. Beckstrom, Esq.  
Nevada State Bar No. 14032  
400 South 4th Street, Suite 650  
Las Vegas, Nevada 89101  
[jb@beckstromlaw.com](mailto:jb@beckstromlaw.com)

RUSSELL A. BIKOFF LAW FIRM  
Russell A. Bikoff (D.C. Bar No. 407397)  
(Admitted Pro Hac Vice)  
1620 L Street, N.W., Suite 610  
Washington, DC 20037  
[rab@bikofflaw.com](mailto:rab@bikofflaw.com)

SZYMKOWICZ & SZYMKOWICZ, LLP  
J.P. Szymkowicz (D.C. Bar No. 462146)  
John T. Szymkowicz (D.C. Bar No. 946079)  
P.O. Box 57333  
Washington, DC 20037-0333

[jp@szymkowicz.com](mailto:jp@szymkowicz.com)  
[john@szymkowicz.com](mailto:john@szymkowicz.com)  
*Attorneys for Defendant Brook Bekele Beshah*

By: /s/ Kiley A. Harrison

Rory T. Kay, Esq. (NSBN 12416)  
Karyna Armstrong (NSBN 16044)  
Kiley A. Harrison, Esq. (NSBN 16092)  
2300 West Sahara Avenue, Suite 1200  
Las Vegas, Nevada 89102  
[rkay@mcdonaldcarano.com](mailto:rkay@mcdonaldcarano.com)  
[karmstrong@mcdonaldcarano.com](mailto:karmstrong@mcdonaldcarano.com)  
[kharrison@mcdonaldcarano.com](mailto:kharrison@mcdonaldcarano.com)

SHEPPARD MULLIN RICHTER  
& HAMPTON LLP  
Hwan Kim, Esq. (D.C. Bar No. 463623)  
(Admitted Pro Hac Vice)  
2099 Pennsylvania Ave, N.W., Ste. 100  
Washington, DC 20006-6801  
[hkim@sheppardmullin.com](mailto:hkim@sheppardmullin.com)

Neil A.F. Popović, Esq.  
(CA Bar No. 132403)  
(Admitted Pro Hac Vice)  
Joy O. Siu, Esq. (NSBN 15095)  
Four Embarcadero Center, 17th Floor  
San Francisco, CA 94111  
[npopovic@sheppardmullin.com](mailto:npopovic@sheppardmullin.com)  
[juiu@sheppardmullin.com](mailto:juiu@sheppardmullin.com)  
*Attorneys for Plaintiffs*

**IT IS SO ORDERED.**



**RICHARD F. BOULWARE, II**  
**UNITED STATES DISTRICT JUDGE**

**DATED:** This 22nd day of March 2025.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 21, 2025, a copy of the foregoing **STIPULATION AND ORDER EXTENDING PLAINTIFFS' DEADLINE TO FILE OPPOSITION TO DEFENDANT BROOK BEKELE BESHAH'S MOTION FOR SUMMARY JUDGMENT** was filed electronically through the Court's CM/ECF system, which causes service upon all counsel registered thereon and was served via email and by depositing a copy in the U.S. Mail, postage prepaid, upon the parties and at the address listed below:

James A. Beckstrom, Esq.  
Beckstrom & Beckstrom, LLP  
400 South 4th Street, Suite 650  
Las Vegas, Nevada 89101  
[jb@beckstromlaw.com](mailto:jb@beckstromlaw.com)  
[jt@beckstromlaw.com](mailto:jt@beckstromlaw.com)  
[sb@beckstromlaw.com](mailto:sb@beckstromlaw.com)

Russell A. Bikoff, Esq.  
P.O. Box 615  
McLean, VA 22101  
[rab@bikofflaw.com](mailto:rab@bikofflaw.com)

J.P. Szymkowicz, Esq.  
John T. Szymkowicz, Esq.  
Szymkowicz & Szymkowicz, LLP  
P.O. Box 57333  
Washington, DC 20037  
[jp@szymkowicz.com](mailto:jp@szymkowicz.com)  
[john@szymkowicz.com](mailto:john@szymkowicz.com)

Russell A. Bikoff, Esq.  
2021 L Street, N.W., Suite 300  
Washington, DC 20037  
[rab@bikofflaw.com](mailto:rab@bikofflaw.com)

/s/ Leah Jennings  
An Employee of McDonald Carano LLP